

SAMUEL J. MANCINI  
306 HUMBOLDT ST.  
DENVER, CO 80218

Defendant In Pro Per

303-884-9007

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,	)	Case No.: 2:22-CR-00253-CCC-1
	)	
Plaintiff,	)	EX PARTE APPLICATION OF
vs.	)	DEFENDANT SAMUEL J. MANCINI
	)	FOR AN ORDER EXTENDING
SAMUEL J. MANCINI,	)	FEDERAL PRISON REPORTING
	)	DATE; MEMORANDUM OF POINTS
Defendant	)	AND AUTHORITIES
	)	
	)	

---

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

On March 21, 2024, this Court sentenced Defendant Samuel J. Mancini to:

- a) serve a term of 71 months of Federal Custody with a surrender date of April 2, 2022; and
- b) upon release from custody serve a period of 36 months of supervised release under the supervision of the U.S. Probation Office.

1 On March 28, 2024, this Honorable Court granted a delay of execution of sentence  
2 for good cause until April 23, 2024.

3 Defendant hereby requests that the Court grant him an additional and final 30-day  
4 extension of his prison surrender date from April 23, 2024 until May 23, 2024, based on  
5 the following:

6 At the time of sentencing, the Court made a Judicial Recommendation that it was  
7 the Court's intent that Defendant be assigned to serve his custody sentence at the Federal  
8 Prison facility is located in Yankton, South Dakota, which is approximately 550 road  
9 miles from the Defendant's Denver home and approximately an 8 to 9 hour drive by car.

10 On April 8 , 2024, the Defendant received orders from the U.S. Marshal Service  
11 informing him that he is to report to FCI Texarkara, Texas which is 950 miles and  
12 approximately a 15 drive from his home in Denver, Colorado  
13

14 Pursuant to Bureau of Prisons Program Statement 5100.08, the BOP attempts to  
15 designate inmates to facilities near their Home of Record commensurate with their  
16 security and program needs so that they can maintain family ties for release and  
17 community reintegration.  
18

19 The Defendant maintains a daily close personal relationship with his 15 year old  
20 daughter who suffers from anxiety and respiratory issues and his 12 year old son who  
21 suffer from asthma and metamorphopsia.  
22

23 The driving distance and time on the road with the Defendant's children to the BOP's  
24 current designation location of FCI Texarkana, Texas, creates a significant hardship for the  
25 Defendant's family with respect to Defendant's ability to maintain the family ties and  
26 community reintegration that the BOP strives to accomplish.  
27  
28

1 **II. CONCLUSION**

2  
3 Based on the foregoing, Defendant prays that the Court grant him a 30-day  
4 extension to give the Bureau of Prisons designation center (DSCC) an opportunity to  
5 reconsider the defendant's re-designation from FCI Texarkana, Texas to FCI  
6 Yankton, South Dakota to comply with the custody intent made by this court  
7 and the BOP's own policies.  
8  
9  
10  
11

12 DATED: April 11, 2024

Respectfully submitted,

13  
14   
15 Samuel J. Mancini

Defendant In Pro Per